

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

CITIGROUP INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:08-cv-727CMH/TCB
v.	)	
	)	
CHEN BAO SHUI, and	)	
<CITYBANK.ORG>,	)	
	)	
Defendants.	)	

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**DECLARATION IN SUPPORT OF REQUEST FOR ATTORNEYS' FEES**

Janet Shih Hajek, pursuant to 28 U.S.C. § 1746, declares and says:

1. I am over the age of eighteen, competent to give this Declaration, and do so based on my knowledge of the facts stated herein.
2. I am an attorney of record for Plaintiff Citigroup Inc. ("Plaintiff") and I acted as counsel for Plaintiff in the above-captioned case.
3. I am currently of-counsel in the law firm of Greenberg Traurig, LLP ("Greenberg Traurig"). As such, I have responsibility for the above-captioned action (the "Action") on behalf of Plaintiff. As part of that responsibility, I have reviewed the attorneys' fees and costs incurred for the Action on behalf of Plaintiff.
4. Attached hereto as **Exhibit A** are true and correct copies of the invoices submitted to Plaintiff for legal services performed by Greenberg Traurig in prosecution of the claims brought by Plaintiff against Defendant. These invoices are kept and maintained by Greenberg Traurig in the ordinary course of its business and were generated contemporaneously with the activities reflected therein.

5. As indicated in the invoices attached as Exhibit A, legal services were performed for Plaintiff's benefit by: 1) partners and of-counsel Paul D. McGrady, Jr., Steven J. Wadyka, and Janet S. Hajek, whose billable rates ranged from \$380 to \$505 per hour; 2) associates Jason B. Elster, Jeffery P. Dunning, Precious Murchison, and Marc Leipzig, whose billable rates ranged from \$230 to \$445 per hour; and 3) by paralegals Maria Scavo and Laura A. Cappello, whose billable rates ranged from \$185 to \$210 per hour. These rates are in accord with the rates charged by other firms of similar size and experience in this jurisdiction.

6. As indicated in the attached invoices, Plaintiff has incurred a total of \$59,066.39 in legal fees based on the time spent by its attorneys and paralegals on this matter (the total amount includes \$1,171.89 in Westlaw, Lexis and Pacer research fees). These fees were all incurred in conjunction with services that were reasonably required in an effort to prosecute the claims brought by Plaintiff against Defendant.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 10, 2009

  
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Janet Shih Hajek  
VA Bar No. 44544

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of March 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. And I hereby certify that I will mail the document by U.S. mail and by registered electronic mail to the following non-filing user:

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/s/ Janet Shih Hajek  
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